

Exhibit 10

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DONNA WOOD, individually and on behalf all
others similarly situated, et al.,

Plaintiff,

v.

MIKE BLOOMBERG 2020, INC.,

Defendant.

No. 20-cv-02489-LTS-GWG

DECLARATION OF FRIDA MICHELLE NARANJO

I, Frida Michelle Naranjo, declare, based on personal knowledge and under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I worked for Mike Bloomberg 2020, Inc. (the “Campaign”) as a Field Organizer from about February 10, 2020 to March 13, 2020
2. I worked out of the McAllen, Texas Campaign office.
3. The Campaign advertised that the Field Organizer position that would continue until the November 2020 Presidential Election, regardless of whether Michael Bloomberg remained in the race.
4. When I interviewed for the Field Organizer job, Amanda Salas [Regional Organizing Director] told me that, if I was hired, the Campaign guaranteed that I would continue to receive my salary and benefits through November, even if Michael Bloomberg was no longer a candidate for office.
5. Multiple times throughout my employment, the Campaign represented that it would continue to pay my salary and benefits through November, as well as the salary and benefits of the other Field Organizers. I relied on these promises. I left jobs at Best Buy and

Kumori to work for the Campaign because of the promise of employment through November 2020.

6. Nevertheless, the Campaign terminated my employment on March 13, 2020 and terminated my salary and benefits as of March 31, 2020.

7. My typical schedule was seven days a week. On Mondays through Friday, I usually worked around 9 a.m. to 9 or 10 p.m. On Saturdays, I worked from about 10 a.m. to 7 p.m. On Sundays, I usually worked from 11 a.m. to 8 p.m. During one week, we started at 7 a.m. every day.

8. I usually worked about 77 to 80 hours per week. I was never paid any overtime wages when I worked more than 40 hours in a week.

9. My main job duties as a Field Organizer were to call prospective voters to promote Michael Bloomberg's candidacy for President and to recruit volunteers for phone banking and canvassing efforts. The Campaign required that I meet certain metrics for the number of calls I made, which were many per week. I also met with voters and went door-to-door to encourage voters to vote for Michael Bloomberg.

10. All Field Organizers I observed performed these same duties, which the Campaign headquarters dictated.

11. As a Field Organizer, I had no authority to set other employees' schedules or my own, to direct the work of other employees or my own, or to hire, fire, or discipline other employees. All important decisions were made by a Regional Organizing Director, a state director, or by officials in the Campaign's national headquarters in New York, NY.

12. I also had no authority to make decisions of significance regarding the operations of the Campaign or my field office. I performed the job duties assigned by my Regional

Organizing Director, including calling the potential voters, canvassing neighborhoods, and/or visiting addresses assigned to me each day by the Regional Organizing Director.

13. My job duties did not require any specialized education, training, or experience. After I was hired, I attended an orientation at which I learned about the basic job responsibilities.

14. I used a script from the Campaign when making voter phone calls or speaking to voters in person.

15. I frequently received emails from officials in the Campaign's New York headquarters.

16. I also attended weekly conference calls with Campaign staffers across the country during which officials in the Campaign's New York headquarters, who led the calls, provided updates and directives.

17. The Campaign's New York headquarters also required me and other Field Organizers to participate in additional conference calls with Campaign staffers across the country. During these calls, Campaign officials in the New York headquarters provided information and guidance, including talking points for explaining the campaign's policy proposals to voters.

18. My monthly salary was \$6,000.00.

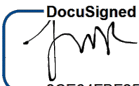
19. I also participated in the Campaign's health plan.

20. The Campaign did not pay me any overtime compensation for the hours I worked in excess of 40 in a workweek or 8 in a day.

21. I also know that other Field Organizers worked many overtime hours each week without receiving overtime pay. I know this because I worked with these Field Organizers and we discussed and witnessed how long we all worked. I also worked in San Antonio with a team

of about seven Campaign offices for a big Campaign effort and there were about 100 Field Organizers working in San Antonio. I witnessed these Field Organizers work many overtime hours without overtime pay and they were all working everyday and about 11 to 13 hours per day.

Dated: 3/30/2020

DocuSigned by:

By: 8CE64FBF25CE4ED...
Frida Michelle Naranjo